

### **REMARKS**

The Official Action mailed November 8, 2006, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Accordingly, the Applicant respectfully submits that this response is being timely filed.

The Applicant notes with appreciation the consideration of the Information Disclosure Statements filed on August 30, 1999; April 26, 2001; March 5, 2002; April 12, 2002; September 8, 2005; November 18, 2005; March 1, 2005; March 30, 2006; and August 25, 2006.

Claims 7-26 are pending in the present application, of which claims 7, 11, 15, 19 and 23 are independent. Claims 7, 11, 15, 19 and 23 have been amended to better recite the features of the present invention. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

Paragraph 4 of the Official Action rejects claims 7-9, 11, 13-15, 17-19, 21-23, 25 and 26 as obvious based on the combination of U.S. Patent No. 6,007,209 to Pelka and U.S. Patent No. 6,266,108 to Bao. Paragraph 9 of the Official Action rejects claims 10, 12, 16, 20 and 24 as obvious based on the combination of Pelka, Bao and U.S. Patent No. 6,124,911 to Nakamura. The Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

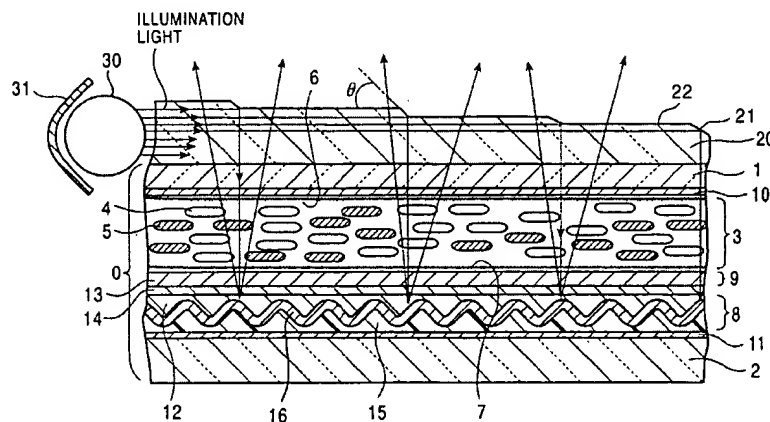
As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the

teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

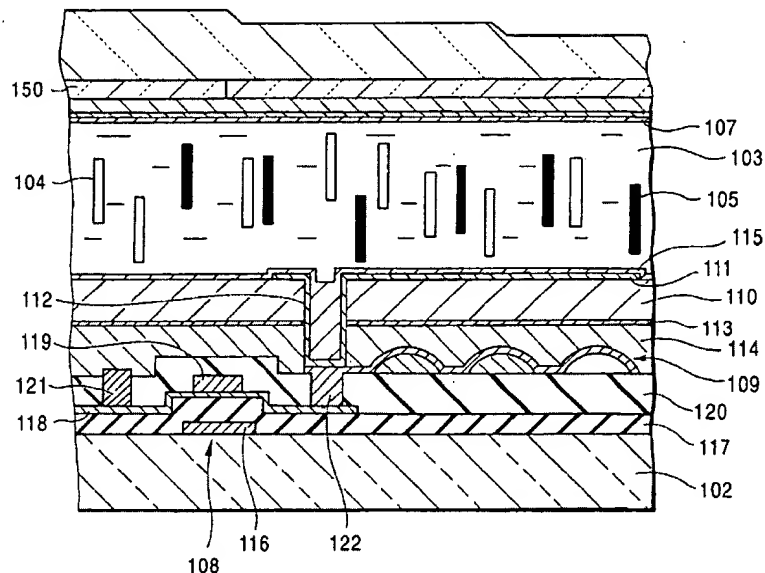
The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims, as amended. Independent claims 7, 11, 15, 19 and 23 have been amended to recite that a white light is reflected on an interface between a liquid crystal and a pixel electrode, which is supported in the present specification, for example, by Figure 4E. For the reasons provided below, Pelka, Bao and Nakamura, either alone or in combination, do not teach or suggest the above-referenced features of the present invention.

The Official Action concedes that Pelka does not teach "a reflection type liquid crystal panel comprising an active matrix substrate and a counter substrate, and a color filter adjacent to the counter substrate, wherein said active matrix substrate having a plurality of thin film transistors and a plurality of pixel electrodes connected with the thin film transistors, wherein white light emitted from the light source is introduced into said liquid crystal panel from sides of said counter substrate of said liquid crystal panel, wherein at least a part of the white light introduced to said counter substrate is reflected on the pixel electrode so as not to pass through the active matrix substrate" (page 3, Paper No. 20061030). The Official Action relies on Bao to allegedly teach that "white light emitted from the light source [30] is introduced into said liquid crystal panel [0] from sides of said counter substrate [20] of said liquid crystal panel [0]" (page 4, Id.).

However, the illumination light of Bao appears to be reflected on an interface between the flattening layer 12 and the metal film 16 as shown in Figure 1 (reproduced below).



The Applicant notes that, in Bao, the flattening layer 12 shown in Figure 1 appears to correspond with the flattening layer 114 shown in Figure 4, and that the metal film 16 shown in Figure 1 appears to correspond with the reflecting layer 109 shown in Figure 4 (reproduced below).



Therefore, the Applicant respectfully submits that, if one were to assert that the reflecting layer 109 of Figure 4 of Bao corresponds with the pixel electrode of the present claims, then the alleged combination of Pelka and Bao does not teach or

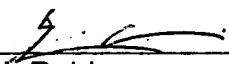
suggest that a white light is reflected on an interface between a liquid crystal and a pixel electrode.

Nakamura does not cure the deficiencies in Pelka and Bao. Nakamura is relied upon to teach the features of dependent claims 10, 12, 16, 20 and 24. Specifically, Nakamura is relied upon to allegedly teach pixel electrodes comprising metal material (page 5, Paper No. 20061030). However, Pelka, Bao and Nakamura, either alone or in combination, do not teach or suggest that a white light is reflected on an interface between a liquid crystal and a pixel electrode.

Since Pelka, Bao and Nakamura do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

  
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